

# St Mary's Football Group Limited

## Modern slavery statement

This statement has been published in accordance with the Modern Slavery Act. It sets out the steps taken by all companies within St Mary's Football Group during the financial year ending 30 June 2016 to prevent modern slavery and human trafficking in our business and supply chains.

### Our commitment

We do not tolerate any form of modern slavery or human trafficking in organisation or anywhere in our supply chain. This statement sets out what steps we have taken to eliminate modern slavery and human trafficking to date. It also provides an outline of our plans to improve the controls that we have in place to evaluate our suppliers increasingly effectively and ensure that our own practices remain compliant with all applicable laws.

### Our group

St Mary's Football Group features three primary trading companies:

**Southampton Football Club Limited:** A Premier League football club with global presence.

**St Mary's Catering Limited (trading as Halo Conferences & Events):** An events management company providing food, beverage and events management services.

**St Mary's Training Centre Limited:** A training company that delivers adult and apprentice training courses.

In addition to these companies, the group has an affiliated charity, Saints Foundation, and an operating company in North America.

### Our business and our supply chain

We are aware of the need to be conscious of the working conditions and practices within our supply chain. Following the introduction of the Modern Slavery Act we have risk assessed all of our business partners and have completed initial due diligence on them. We have also introduced a new Procurement Policy to specifically cover our expectations in relation to ethical trading.

Our business is extremely diverse meaning that we have suppliers that work across a broad range of industries including suppliers of IT and office equipment, playing and replica kit, retail, digital media services, food and drinks and labour.



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### Our progress so far

We have:

- Implemented a clear policy that is made available to all business partners and on our website that sets out our expectations around ethical trading and the fact that we do not tolerate any form of modern slavery or human trafficking.
- Clearly set out our expectations to our own staff through the commitments made in our Code of Ethics. This helps our staff to make informed ethical and legal decisions.
- Established clearer guidelines that ensure due diligence is carried out on all business partners before we engage with them.
- We now include modern slavery provisions in our standard terms and conditions of business and commercial contracts to ensure that our suppliers adhere to our policies.
- Conducted a full internal review of our own payment policies, processes and rates to all staff and contractors.
- Conducted an initial risk assessment of our suppliers by industry.
- Completed initial training of key individuals internally to raise awareness of the Modern Slavery Act.

### Our next steps

We are working to increase the level of due diligence completed on all business partners to make sure that we continue to engage with ethical companies. Over the next twelve months we will:

- Continue to evaluate our internal processes to ensure full compliance with the law internally.
- Following the outcome of the risk assessments already undertaken, conduct a full review and evaluation of all direct (Tier 1) suppliers and business partners that work with St Mary's Football Group.
- Continue to work collaboratively with our business partners and seek to exert commercial influence where it might be possible to make improvements to the ethical or social performance of our suppliers.
- Establish effective ongoing monitoring of all business partners.
- Implement a more complete training and awareness programme to cover all staff and contractors.



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### Non-compliance

We work to remedy any areas in which our suppliers do not meet the standards that we expect. This may include ultimately ceasing to trade with partners who do not continue to meet our internal criteria for selection or breach relevant regulations.

### Management endorsement

This statement has been approved by our board of directors and was received in May 2017.



Toby Steele

Company Secretary

For and on behalf of St Mary's Football Group Limited

